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6 UNITED STATES DISTRICT COURT
7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE

8 HSBC BANK USA, NATIONAL
9 ASSOCIATION AS TRUSTEE FOR THE J.P.
10 MORGAN ALTERNATIVE LOAN TRUST
2006-A7,

11 Plaintiff,

12 v.

13 DONALD E. MACCORD et al.,

14 Defendants.

15 DONALD E. MACCORD,

16 Counterclaim Plaintiff,

17 v.

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19 NATIONSTAR MORTGAGE, LLC, HSBC
20 BANK USA, NATIONAL ASSOCIATION AS
21 TRUSTEE FOR THE J.P. MORGAN
ALTERNATIVE LOAN TRUST 2006-A7,

22 Counterclaim Defendants.
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CASE NO. 2:17-cv-00877-RSM

STIPULATION AND ORDER TO
EXTEND DISCOVERY AND
DISPOSITIVE MOTION DEADLINES
BY 30 DAYS

NOTING DATE:
May 24, 2018

STIPULATION AND ORDER TO EXTEND
DISCOVERY AND DISPOSITIVE MOTION
DEADLINES BY 30 DAYS - 1

Case No. 2:17-cv-00877-RSM
{S1707242}



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STIPULATION

Plaintiff/Counterclaim Defendant HSBC Bank USA, National Association, Counterclaim Defendant Nationstar Mortgage LLC, and Defendant/Counterclaim Plaintiff Donald E. MacCord (“Defendant/Counterclaim Plaintiff”) (collectively, the “Parties”), by and through their undersigned counsel, hereby stipulate to a 30 day extension of the discovery and dispositive motion deadlines enumerated in the Court’s August 30, 2017 Order Setting Trial Date and Related Dates, and respectfully request that the Court enter an Order to extend said deadlines. In requesting this extension of time, the Parties hereby represent as follows.

1. Defendant/Counterclaim Plaintiff removed this matter (“Litigation”) from King County Washington Superior Court, Case No. 16-2-26478-6 SEA, on June 6, 2017. ECF 1.

2. On June 15, 2017, the Court entered its August 30, 2017 Order Setting Trial Date and Related Dates (“Order Setting Trial Date and Related Dates”) setting forth the trial date and deadlines regarding discovery, dispositive motions, and related pre-trial matters. ECF 25.

3. The Parties engaged in mediating this matter on or about December 20, 2017, which mediation did not immediately resolve the Litigation, however defined their respective positions and led to the continued and ongoing attempt to settle this matter.

4. After the mediation ended, it was determined that continued negotiations would require that the Parties ascertain the condition of the real property (“Property”) related to the Litigation.

5. The Parties have continued to cooperate, and the Property was recently evaluated to facilitate the ongoing effort to resolve the Litigation.



6. With the result of the evaluation of the Property only just becoming available, the Parties will require additional time to assess the impact of the condition of the Property on negotiations.

7. The parties anticipate making additional progress with negotiations, and wish to focus their time and resources on settlement rather than discovery.

8. In light of the ongoing settlement efforts, the Parties agree and hereby stipulate that a 30 day extension of the discovery and dispositive deadlines is needed to work toward the resolution of this matter.

9. This matter is set for trial on November 19, 2018, and the Parties do not anticipate that the 30 day extension requested herein will delay trial.

10. Accordingly, the parties propose to extend the dates set forth in the Order Setting Trial Date and Related Dates as follows:

EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Disclosure of expert testimony under FRCP 26(a)(2)	May 23, 2018	June 22, 2018
Deadline for filing motions related to discovery	June 22, 2018	July 23, 2018
Discovery completed by	July 23, 2018	August 22, 2018
Dispositive Motion Deadline	August 21, 2018	September 20, 2018

11. The Parties are not seeking this extension of time for the purpose of delay, and no party will suffer prejudice from the extension of time requested herein.

WHEREFORE, the Parties hereby stipulate and respectfully request that the Court enter an Order to extend the above-listed deadlines set forth in the Court's August 30, 2017 Order

Setting Trial Date and Related Dates, and that the new deadlines be set as provided herein above,
or for such dates as may be convenient for the Court.

Dated: May 23, 2018

CORR CRONIN MICHELSON
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s/ Todd T. Williams

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Dated: May 24, 2018

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Dated: May 23, 2018

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STIPULATION AND ORDER TO EXTEND
DISCOVERY AND DISPOSITIVE MOTION
DEADLINES BY 30 DAYS - 4

Case No. 2:17-cv-00877-RSM
(S1707242)



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ORDER

Plaintiff/Counterclaim Defendant HSBC Bank USA, National Association, Counterclaim Defendant Nationstar Mortgage, LLC, and Defendant/Counterclaim Plaintiff Donald E. MacCord having stipulated to extend certain dates set forth in this Court's August 30, 2017 Order Setting Trial Date and Related Date for a period of thirty (30) days, **NOW THEREFORE** for good cause shown, it is hereby **ORDERED, ADJUDGED, and DECREED** that the below-listed dates set forth in the Court's August 30, 2017 Order be, and hereby are, extended for thirty days as follows:

EVENT	CURRENT DEADLINE	NEW DEADLINE
Disclosure of expert testimony under FRCP 26(a)(2)	May 23, 2018	June 22, 2018
Deadline for filing motions related to discovery	June 22, 2018	July 23, 2018
Discovery completed by	July 23, 2018	August 22, 2018
Dispositive Motion Deadline	August 21, 2018	September 20, 2018

Dated this 25th day of May, 2018.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

STIPULATION AND ORDER TO EXTEND
DISCOVERY AND DISPOSITIVE MOTION
DEADLINES BY 30 DAYS - 5

Case No. 2:17-cv-00877-RSM



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23 *Agreed as to Form; Presentment Waived:*

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STIPULATION AND ORDER TO EXTEND
DISCOVERY AND DISPOSITIVE MOTION
DEADLINES BY 30 DAYS - 6

Case No. 2:17-cv-00877-RSM



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